

TENNESSEE
WORKFORCE INVESTMENT SYSTEM

State Plan For The
Vocational Rehabilitation Services Program

Title I – Part B

Title VI – Part B

Fiscal Year 2009

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**DIVISION OF REHABILITATION SERVICES
TITLE 1, STATE PLAN AND ITS TITLE VI, PART B SUPPLEMENT FOR THE
SUPPORTED EMPLOYMENT PROGRAM FOR
FISCAL YEAR 2009**

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Attachments to Title I State Plan**Attachment 4.2 (c) - Input of State Rehabilitation Council**

The State Rehabilitation Council (SRC) is established in Section 105 of the Rehabilitation Act of 1973, as amended (Act), and 34 CFR 361.16-361.17 of its implementing regulations. The SRC gives advice to and works in partnership with the Division of Rehabilitation Services. The State Rehabilitation Council met on April 4, 2008, for the purpose of reviewing, providing input and recommendations to the State Plan Annual Update Title I, Part B and Title VI, Part B supplement. Input from the Council is inserted throughout the Plan including the following recommendations and the Division's response.

1. The State Rehabilitation Council continues to express concerns relative to the need for increasing the appropriation of State dollars to supplement the available Federal dollars in the Title I Basic Support Program, after all available Federal dollars have been utilized. The Council expressed concern relative to the Division's continued operation under an Order of Selection and the growing number of eligible individuals that cannot be served due to funding limitations. As of 3/31/2008, the number of eligible individuals on the waiting list in closed Priority Categories not receiving services was 7,685. The SRC strongly encourages that any carryover funds or state supplemental funds be spent on reducing the waiting list as a first consideration.

The SRC wishes to strongly commend the Division for their opening of services to individuals who had been on the waiting list in Priority Category 2 as far back as 2001. The SRC would like to express their gratitude, on behalf of the 2,007 individuals who have been taken off the waiting list and given the opportunity to participate in an Individualized Plan of Employment with the Division of Rehabilitation Services.

The SRC recommends the Division continue these positive efforts and to consider all other internal cost savings measures before giving consideration to changes that affect client services, to the maximum extent possible. For example, although these positions may not be filled, it appears that the Division has grown in employees from their 2006 State Plan number of 603 to a 2009 State Plan number of 652. The SRC certainly recognizes the need to provide superior services to vocational rehabilitation clients, and a reduction in the waiting list will logically result in an increased need for front line staff. However, since the number of vocational rehabilitation counselors was actually reduced from 268 in the 2006 State Plan to 266 in the 2009 State Plan, while the number of higher paid Program Director positions rose from 5 to 8 in the same time span, the SRC would caution the Division to attend to this rising payroll expense before ever considering cutting services at the client level. The SRC continues to express concern that the increase in employees at the State Office level may not directly improve client services at the front line level.

Along these lines, the SRC wishes to express its gratitude for the Assistant Commissioner's annual report on the Division's budget and looks forward to

this becoming a standard topic in future SRC meetings. The SRC would request that current fiscal year figures be utilized for a better “real-time” understanding by Council members, and that consideration be given to the Council having some input in advance of budget hearings each year.

RESPONSE:

The Division continues to have adequate state funds to draw down every available federal dollar, including federal re-allotment funds from other states. Although the State of Tennessee faces a serious drop in state revenue for Fiscal Year 2009, the Division still will have adequate state funds to match its federal appropriation. If reductions in funding and staffing levels are necessary, the Division will ensure that reductions occur in those areas that have the least impact on direct client services. The Division will continue to operate under an Order of Selection during Fiscal Year 2009. As of March 31, 2008, the Division released 2,007 individuals from the Order of Selection waiting list. The Division will continue to monitor the funds needed to serve the 2,007 individuals released from the waiting list and will consider further releases from the waiting list as funds allow. However, with continued limited funds and resources the Division of Rehabilitation Services has not been able to provide services to all eligible individuals who have applied since August 2001. Therefore, execution of the Order of Selection mandated by the Rehabilitation Act of 1973, as amended, was and is still warranted. The Order of Selection serves as a means of determining which eligible individuals will be served. Services and expenditures are monitored on a continuous basis to enable the Division to close or open priority categories as deemed appropriate.

The SRC is correct that in Fiscal Year 2006 the Division's total staffing was 603 positions and that number has increased to 652 for Fiscal Year 2009. This increase occurred in the Fiscal Year 2006/2007 as a result of moving Transition from School to Work (TSW) case manager positions from contract to actual state positions. This move was necessary as a result of an RSA review indicating that contract positions could not do the non-delegable functions of a vocational rehabilitation counselor. Therefore, your statement that the number of counselor positions had reduced from 268 in the Fiscal Year 2006 state plan to 266 in the Fiscal Year 2009 state plan is inaccurate. The Fiscal Year 2006 state plan reflects 221 vocational rehabilitation counselor positions. The increase from 221 in Fiscal Year 2006 to 266 in Fiscal Year 2009 came about as stated above by moving the TSW contract positions to state positions.

The three (3) director positions referred to are not new positions but are reclassifications of existing positions. One director was a name change from the TTAP Program Director position to a HS Program Director 1 in order to allow the TTAP director to assist with vocational rehabilitation functions. The second director was an upgrade of a supervisor of blind services to a HS Director 1 due to the position's assumption of supervision of services for the Deaf and Hard of Hearing. The third director resulted from the reclassification of a vacant clerical position to HS Director 2 for Quality Improvement. This director's duties include implementing RSA

suggestions from both its Fiscal Year 2005 performance audit and its Fiscal Year 2008 monitoring visit as well as serving as independent ombudsman for client inquiries.

Although there is no increase in number of staff positions, the Division constantly looks at current classification and/or reclassification of positions for improved services for clients. Services and expenditures are monitored on a continuous basis to enable the Division to close or open priority categories as deemed appropriate. The Division continues to carefully monitor programs, expenditures, and staffing patterns and will continue to pursue internal cost savings measures.

2. The State Rehabilitation Council supports the Division's efforts toward achieving the Comprehensive System of Personnel Development (CSPD) requirements. The Council recommends the Division continue to aggressively pursue all available training slots at those universities receiving Federal Rehabilitation Services Administration (RSA) grants for vocational rehabilitation counselors to obtain a master's degree in Rehabilitation Counseling. The Council acknowledged and congratulated the Division for its continued efforts in securing a competitive entrance level of pay through the Department of Personnel for new vocational rehabilitation counselors with a master's degree in Rehabilitation Counseling and for its continued efforts in securing a pay incentive for those incumbent vocational rehabilitation counselors who obtain a master's degree in Rehabilitation Counseling.

However, regardless of the increases in salary for vocational rehabilitation counselors since CSPD requirements became part of the Rehabilitation Act by regulation in 2001, the Division has asked the Rehabilitation Services Administration for a waiver from this requirement for a master's degree and to allow a lower state standard of Bachelors Degree. Even though the SRC did agree that if requiring a master's degreed counselor or supervisor to fulfill certain non-delegable functions, (such as signing the IPE) would result in a delay of client services, the requirement would not be in the client's best interest. On the other hand, the SRC wishes to express their disappointment in the end result of a lowered standard in Tennessee compared to most other states. The SRC agreed with this as a temporary measure but wishes to encourage the agency to continue to aspire to the national standard (master's degree) in the near future.

Nonetheless, the SRC is encouraged by the Division's 11 page CSPD attachment to this year's State Plan which undoubtedly took a great deal of thought on the part of Division Administrators. The end result for clients in Tennessee may very well be an improvement of the overall quality of services they receive. The SRC also wishes to request that the Division allow SRC members who wish to attend some of the continuing trainings being offered to vocational rehabilitation counselors as they upgrade their skills, if possible.

RESPONSE:

The Division has the goal of hiring as many vocational rehabilitation counselors as possible who already have a master's degree, and the Division has worked with Human Resources to ensure that vocational

rehabilitation counselor applicants holding a master's degree in rehabilitation counseling receive extra weight in the rating process so that they are more reachable on the career service register. There are simply too few candidates holding master's degrees in rehabilitation counseling in the applicant pool. Therefore, to require a master's degree in vocational rehabilitation at entry level would mean that the Division could not fill a number of open positions, particularly in rural areas. This would have a detrimental effect on client service. Similarly, to develop a vocational rehabilitation counselor classification limited to vocational rehabilitation counselors holding master's degrees in rehabilitation counseling would require limiting some vocational rehabilitation counselor functions such as eligibility determination and plan development to approximately 40% of incumbent counselors and to new counselors holding Master's degrees, for which the qualified applicant pool is already too small. Human Resource policy also prevents the Division from requiring incumbent counselors to obtain their master's degree. Again, clients would suffer from the resulting staff shortage.

As a result, the Division has re-aligned its state plan with the standard that we have been using in practice,

However, the Division will continue to encourage skill development beyond minimum qualifications by aggressively pursuing all available training slots related to training vocational rehabilitation counselors. The Division will continue its collaboration with State Department of Human Resources to get competitive salaries for new hires, as well as pay adjustments for incumbent counselors that obtain their master's degrees in Rehabilitation Counseling. In addition the Division has put into place mandatory vocational rehabilitation counselor training in core courses specifically related to vocational rehabilitation which will ensure that all vocational rehabilitation counselors will have the necessary training and knowledge to deliver excellent services to its clients.

The Division has dedicated a program specialist for staff development whose responsibility is to aggressively market the job of vocational rehabilitation counselor to new graduates of all of the universities that provide training for a master's degree in Rehabilitation Counseling and recruit those graduates to fill vocational rehabilitation counselor positions. In addition, the recruiter will continue efforts to recruit staff that already has a master's degree.

The Division will consider the SRC request that the Division allow SRC members to attend some of the continuing trainings being offered to vocational rehabilitation counselors, but recommends that such material and other information about the vocational rehabilitation program be presented at SRC meetings in a manner that will deliver the most effective formulation of information to all SRC members.

3. The State Rehabilitation Council recommended that the Division create funding sources for advertisement at the local level for SRC activities such as

public hearings and Council meetings to enhance consumer awareness and participation. The State Rehabilitation Council wishes to express deep concerns that consideration was given this year to reduce the number of Public Hearings for this State Plan from 6 locations to 1 location. The SRC understands that the 2008 State Plan Public hearings held “throughout the State” (as required by the Rehabilitation Act), were some of the most attended in recent years, with over 150 attendees. Given the unique geographical complexities within the State of Tennessee, the SRC would recommend that the Division continue with the same number of Public Hearings this year as the citizens of Tennessee have come to expect. Next year, the Council will work with the Division to try to develop a creative plan for public dissemination and comment that will include better utilization of assistive technology or telecommunication methods, better advertising, the possibility of public forums conducted by the State Rehabilitation Council throughout the year, a reduction in the number of vocational rehabilitation staff required to attend public hearings, and website development. The SRC is committed to assisting the Division in getting the best public input possible.

The SRC wishes to commend the Division on allowing the SRC to provide input into the State Plan Public Hearing process and for the Division agreeing to conduct six (6) public hearings as had been done in the past.

The State Rehabilitation Council is proud to report that it is near completion of their web page which will be added to the Department of Human Services/Division of Rehabilitation Services’ current web site. This site should increase the awareness of individuals with disabilities in Tennessee who might be interested in the activities of the Council and can assist in recruiting future members.

The State Rehabilitation Council repeats their request that the Division place their Vocational Rehabilitation Policy Manual (VRPM) online for public access, although the SRC understands that this initiative may be awaiting final draft of the “new” VRPM this coming year. The SRC greatly appreciates the Division’s invitation to allow one of its members to serve on a Committee charged with revising the VRPM to make it more understandable to the general public. The SRC wishes to commend the efforts of this Committee, under the outstanding leadership of the Director of Policy and Support Services, Adelle Wood, as they endeavor to make the VRPM more understandable for vocational rehabilitation clients, as well as the general public.

RESPONSE:

The Division agrees that public outreach and geographic diversity provide enhanced opportunities for consumer input. The Division is mindful of balancing the costs of public hearings with the benefit of in-person feedback. The Division was pleased by the SRC’s suggestion to have a local vocational rehabilitation staff member conduct the hearings rather than continuing the practice of state office staff travelling across the state in order to better focus our resources on client service. In addition, the Division has placed the draft State Plan on the Internet, and the public does have the opportunity to make comments electronically. All public

hearing comments on the Title I State Plan will be shared with the State Rehabilitation Council. The Division is encouraged by the State Rehabilitation Council's interest in using technology for cost effective public outreach.

The Division is in the process of updating (in consultation with the SRC) the Vocational Rehabilitation Policy Manual (VRPM). In addition, progress is being made on separating policy and regulations with procedure to make the information in the VRPM more client friendly and more easily understood. It is certainly the Division's intent to place the VRPM online for public access when revisions are completed.

4. The State Rehabilitation Council acknowledged and congratulated the Division for its continued efforts serving transition age clients and the inclusion of Transition School to Work in the Division's Innovation & Expansion Plan. The Council would like to respectfully request that the Division add a thorough report on Transition School to Work activities at the next available SRC meeting so that Council members can be made more aware of this ever growing need.

Specifically, since the Tennessee Department of Special Education reports that approximately 7,000 students with IDEA defined disabilities exit school each year, the Council would like to hear from the Division what specific plans have been made or implemented to target this population; what services are provided to individuals with disabilities while still in school; what percentage of vocational rehabilitation counselors attend IEP meetings; what collaborations have been made between the Division and other entities to ensure these individuals have a "seamless transition" from school to work; and what positive gains have been made, including best practices by Region.

RESPONSE:

The Division of Rehabilitation Services will continue the Transition School to Work (TSW) program initiative. The Division of Rehabilitation Services will continue to use its collaborative relationship with the Division of Special Education to join forces in providing information to the Local Education Agencies, with emphasis on those school systems which have indicated a strong interest in the program. An aggressive public relations activity to inform the Local Education Agencies, students, and their parents about the Transition program and the services available through the Division will continue. Division staff made presentations on its Transition from School to Work program at the Tennessee Disability MegaConference, the statewide Special Education Conference, and the Southeast Regional Rehabilitation Association Conference in support of this effort.

In addition to working with the agencies mentioned above, the Division is actively involved in a multidisciplinary transitions work group comprised of administrative staff from the Division of Rehabilitation Services, the Council on Developmental Disabilities, Division of Mental Retardation Services, Vanderbilt Kennedy Center and Special Education. The purpose

of this group is to utilize the expertise and the commitment of these decision makers to promote, develop and implement projects for transition aged youth to better equip them for the world of work upon their leaving school. One of the major projects of this group is the research and development of a resource map of what services for transition aged youth are in place across state agencies and within each state agency.

Assistant Commissioner Cooper and other Division staff are actively involved in a post-secondary education work group with the Vanderbilt University Kennedy Center. This work group is exploring post-secondary opportunities for students with intellectual disabilities.

The Division will be glad to provide a report on the progress of the Transition from School to Work program in an upcoming SRC meeting and to provide a report containing the statistics and issues including what specific plans have been made or implemented to target this population, what services are provided to individuals with disabilities while still in school, what percentage of vocational rehabilitation counselors attend IEP meetings, what collaborations have been made between the Division and other entities to ensure these individuals have a "seamless transition" from school to work, and what positive gains have been made, including best practices by region.

5. The State Rehabilitation Council recommends that the Division aggressively pursue agreements with other Employment Networks under the Ticket to Work and Work Incentives Improvement Act (TWWIIA) legislation to ensure that SSDI and SSI recipients have the best services possible to enable them to return to work. The Council also recommends that the Division develop a better partnership with career centers throughout the State of Tennessee, by offering to provide vocational rehabilitation expertise; improved referral sources; and training for career center staff to better serve persons with disabilities seeking employment.

The State Rehabilitation Council is greatly appreciative of the Division's efforts to recruit and locate a vibrant new SRC member from the Statewide Workforce Investment System.

The State Rehabilitation Council would like to reiterate their request from last year's State Plan that the Division work with the SRC executive committee to schedule training at a future SRC meeting on the Statewide Workforce Investment System, the Disability Navigator Program, and/or Ticket to Work program, and a tour of one of the local career centers in the near future.

RESPONSE:

The Division of Rehabilitation Services is likewise excited about the new partnership opportunities anticipated in the new Ticket to Work and Work Incentives Improvement Act regulations and will continue to strengthen relationships with partners providing employment services to vocational rehabilitation clients.

The Division's Assistant Commissioner serves on the State Workforce Investment Board and the Division continues to have excellent partnerships with the LWIA career centers located throughout the state. The Division has a vocational rehabilitation counselor housed in all fourteen (14) major service delivery areas and in several of the satellite career centers and has daily interaction and involvement with all of the other partners housed in these facilities. The Division is very involved in cross training with all of the career center partners to educate them on what services the Division can provide its clients and in an effort to develop partnerships with those entities that can provide those services not available from the Division.

The Division will be happy to work with the SRC executive committee to schedule training at future SRC meetings on the Statewide Workforce Investment System, the Disability Navigator Program, the Ticket to Work program as well as arrange a tour of one of the local career centers in the near future.

6. The State Rehabilitation Council recommends that the Division continue to work with Institutions of Higher Education (IHE) to ensure that all clients are receiving needed services. The Council commends the Division's extensive efforts in securing an agreement with the Tennessee Board of Regents. The State Rehabilitation Council is encouraged that an Interagency Agreement has also been reached with the University of Tennessee college system(s) in the state that identifies the responsibilities of each entity related to services and payment for services. The SRC would like to review this agreement since it had not had a chance to review or discuss it prior to signatures of the entities. The SRC would also like the Division to report on its intentions with clients attending private colleges.

Furthermore, the SRC wishes to commend the Division on the creation and sponsorship of a new SRC/TN-Ahead Task Force. This positive effort should act to strengthen the bridge of understanding and collaboration between the Division and the college disabled student services offices throughout the state.

RESPONSE:

The Division is not aware of any instances in which clients are not receiving needed services from IHE's. The Division strongly encourages clients to use the resources provided by the student disability services at the IHE's. The Division of Rehabilitation Services successfully negotiated, as of September 26, 2006, an agreement with the Tennessee Board of Regents that outlines the roles and responsibilities of the IHEs, the Division, and the clients/students. The Division also completed a similar interagency agreement with the University of Tennessee college system(s). Both agreements follow the model IHE interagency agreement provided by RSA and have been provided to the SRC.

Those DRS clients attending private colleges will continue to receive the same level of service as vocational rehabilitation clients attending colleges

in the Tennessee Board of Regents and University of Tennessee systems, with assurances that the college, the Division or other comparable benefit will provide funding for necessary services subject to the Division's rules and regulations.

The Division was glad to facilitate the creation of the SRC/TN-Ahead Task Force and will continue efforts to foster this partnership for the betterment of our mutual clientele.

7. The State Rehabilitation Council wishes to commend the Division on the Consumer Satisfaction Survey results for this year, obtaining an improved 96.6 % satisfaction rate for successful closures (Status 26); an 89.1% satisfaction rate for unsuccessful (Status 28) closures; and a 93.6% satisfaction rate for active cases. The SRC would like to recommend that they be included earlier in the survey process next year since this is a shared responsibility.

The State Rehabilitation Council is very proud of the Division's goal to achieve successful outcomes for at least 2,907 individuals this year. This figure represents an increase over the previous year's actual number of closures. The SRC recognizes that this goal establishes a positive reversal of the trend toward a reduction in successful closures each year, which is so often the unfortunate side effect of operating under an Order of Selection.

The State Rehabilitation Council again wishes to congratulate Assistant Commissioner Cooper and the Division for beginning to bring Tennessee vocational rehabilitation out of the Order of Selection that has been such a constant source of frustration for vocational rehabilitation staff and Tennesseans with disabilities for so long. The SRC stands ready to assist the Division in continuing these positive efforts.

The State Rehabilitation Council also recognizes that a possible side effect of the Order of Selection is a reduction in the success rate when comparing successful closures to unsuccessful closures. Although Tennessee DRS fell just short of their goal this past year, the SRC is encouraged that the Division has set the bar to improve this rate for the coming year to 65%, which is well within the national average.

The State Rehabilitation Council commends the Division for its aspiration towards serving 3500 supported employment clients and achieving successful outcomes for 600 of them. The State Rehabilitation Council would like to respectfully request additional training in supported employment services this year, similar to last year's presentation by Corporate Connections, including the interplay between the Division of Rehabilitation Services with the Division of Mental Retardation Services, to serve their joint clientele.

The State Rehabilitation Council also looks forward to meeting jointly with the Tennessee Rehabilitation Center Board in an upcoming meeting to learn more about this innovative program. If possible, this meeting could be combined with a tour of one of the TRC facilities for all SRC members.

RESPONSE:

The Division of Rehabilitation Services continues to place achievement of high consumer satisfaction ratings as one of its goals and values the continued input of the Council in all phases of the consumer satisfaction process. The Division will continue to work collaboratively with the SRC in addressing and resolving any concerns with specific issues related to the consumer satisfaction process and/or statewide needs assessment activities.

The Division will work with the SRC executive committee to arrange for training in supported employment as it relates to the partnership with the Division of Mental Retardation Services. In addition, a tour of a community rehabilitation center will be arranged for an upcoming SRC meeting.

8. The State Rehabilitation Council wishes to thank the Division for its support for the 2nd Annual SRC Orientation and Retreat which was held in June 2007. In addition, the State Rehabilitation Council wishes to thank the Division for making available a teleconferencing system for use by SRC Subcommittees between quarterly meetings. To ensure appropriate involvement by SRC members in national training opportunities, the SRC Resource Plan should include adequate funds for members to attend such meetings along with their personal care attendant(s) and/or sighted guide(s).

RESPONSE:

The Division of Rehabilitation Services recognizes the function of the Council is to provide input into the vocational rehabilitation process and that orientation and training of members is vital to ensuring a Council that provides leadership and guidance to the vocational rehabilitation program on behalf of persons with disabilities. The Division will continue to fund SRC members and their needed attendants to national training opportunities as the Division's funds and state travel regulations will allow.

9. The SRC continues to encourage the DRS to continue to enforce the Randolph/Sheppard priority and pursue new vending facility locations for licensed blind vendors. The SRC congratulates the Tennessee Business Enterprise (TBE) program for recruiting the BLAST (Business Leadership and Superior Training) sponsored by the National Association of Blind Merchants, to Tennessee so the licensed blind vendors can get involved in the consumer movement and take advantage of the nationally recognized training agenda. The SRC encourages the DRS and TBE to continue to recruit national training programs to Tennessee and continue to urge participation in consumer and advocacy organizations.

With the active participation of Blind Vendors, the Department should develop strategies to educate the members of the General Assembly about the benefits and successes of the Tennessee's Randolph Sheppard Program and aggressively pursue new locations so that business ownership opportunities are available in the future to vocational rehabilitation clients who are legally blind.

RESPONSE:

The Division of Rehabilitation Services will continue to enforce the federal and state laws that grant a priority to blind persons to manage and operate vending facilities on government properties. The Agency has a proven record in this regard as evidenced by its willingness to take to litigation counties that have refused to allow blind vendors to manage their inmate commissaries. The Division will work with the Committee of Blind Vendors and consumer groups to develop materials that the Committee members and consumer groups can use to educate members of the General Assembly about the program. The Division is thankful for the Council's recognition for attracting BLAST to Tennessee.

10. The State Rehabilitation Council continues to recommend the Division aggressively pursue partnerships with other state and local organizations, profit and non-profit, to improve opportunities for consumers in securing and maintaining employment.

The Council recognizes employment for a person with a disability is often dependent on more than job training and is often outside the mandate of the Division; other issues such as accessible housing, accessible transportation, availability of personal care attendants, continued accessibility to the health care system, etc., must also be addressed to achieve successful employment. The Council recommends outreach and networking activities by the Division as an essential strategy to develop successful partnerships with organizations outside the Division to meet these needs.

RESPONSE:

The Division agrees with the State Rehabilitation Council regarding the importance of partnering with other state and local organizations, profit and non-profit, to improve opportunities for clients in securing and maintaining employment. The Division has ongoing interagency cooperation, collaboration, and coordination with several entities to include: Statewide Workforce Investment System, the Department of Children Services in serving youth with significant disabilities; the Department of Health in providing services to individuals with Traumatic Brain Injuries (TBI) and alcohol and drug abuse disabilities; post-secondary school systems in the provision of services to individuals with physical and mental disabilities; the Department of Corrections and local police and sheriff's offices in the provision of services to individuals with significant disabilities being released from correctional facilities; the Department of Human Services, Division of Family Assistance regarding Families First participants with known or suspected disabilities; the Department of Mental Health and Developmental Disabilities and the Department of Finance and Administration, Division of Mental Retardation Services in the provision of services to individuals with mental health and intellectual disabilities; the Tennessee's USDA Rural Development program to determine the best methods of meeting the needs of employers in rural areas through the Division's training and employment activities for people with disabilities, including self-employment; partnerships through letters of agreement with those entities providing

transportation for individuals with disabilities. As "reaching out beyond our web" is a major goal of the Division, other partnerships are constantly being sought that will improve client service delivery.

11. The State Rehabilitation Council continues to recommend that all documents and other forms of communication from the Division to consumers, the general public and Division staff, be in an accessible format or be available in an accessible format at the request of the recipient. The Council recommends that no document be distributed by the Division to consumers, the general public, or Division staff unless it is also available in an accessible format. The Council recommends that electronic document formats such as PDF continue to be utilized if a text version of the document is also provided at the time of distribution. The Council recommends that website materials be in an accessible format. The Council recommends that forms be created using the appropriate accessible formatting based on screen reader requirements to insure forms can be completed on a computer or other electronic device.

The Council also recommends that all equipment purchased or leased by the Division for general use by staff, such as copy machines, fax machines, etc., be fully accessible.

The Council also recommends that the Division incorporate language in all contracts that require documents, such as project updates, final reports, etc., be provided to the Division in accessible formats.

RESPONSE:

The Division agrees with the SRC that all information distributed to the public, clients of the Division and agency staff by the Division should be accessible to all and urges Council members to report any instances of inaccessible communications to the Division immediately.

12. The State Rehabilitation Council continues to recommend that the Division ensure that clients who are blind are able to make informed choices about facility based services, appropriate information should be shared with clients about facilities that provide immersion training and vocational rehabilitation counselors should receive such immersion training so they can better understand blindness.

RESPONSE:

The Division is committed to having its blind services staff well trained in this area. The Division has specialized well trained staff that work solely with individuals with visual impairments and blindness in their efforts toward obtaining and retaining employment; living independently in the home; and developing orientation and mobility skills in the client's home, training and work environment. This staff receives specialized and intensive training in the areas of blindness and visual impairments, including information about immersion training, and is able to advise their clients of all services available to them thereby promoting informed choice for their clients.

Attachments to Title I State Plan**Attachment 4.10 - Procedures and Activities regarding the Establishment and Maintenance of a Comprehensive System of Personnel Development**

Tennessee Code Annotated, Title 8, Chapter 30 gives responsibility to the Commissioner of the State Department of Human Resources to establish methods for handling personnel activities and transactions based on accepted principles of public personnel administration. In this regard, the Department of Human Resources has developed a very comprehensive set of rules and regulations that govern personnel activities of all State agencies. Personnel activities regulated by the Department of Human Resources include: (1) position classification; (2) compensation; (3) employment practices; (4) job performance planning and evaluation; (5) training; (6) disciplinary action; (7) attendance and leave; (8) grievance; (9) employee relations; and (10) equal employment opportunity and affirmative action.

The Classification Plan established and maintained by the Commissioner of the Department of Human Resources is a compilation of the officially authorized classes of positions for the State service. The classification plan contains the classification specification for each classification in the career service (all positions in State service subject to the civil service provisions of the Act).

Classification specifications for the career service include the following:

1. Classification Title
2. Summary or Definition
3. Distinguishing Features
4. Examples of Duties and Responsibilities
5. Minimum Qualifications
6. Examination Method

Position classification is the grouping of individual positions on the basis of similarity of duties, authority and responsibilities assigned, such that the same rates of pay and tests of fitness may be applied to all positions placed in the classification.

The Division adheres to the "Personnel Standards" as set forth by the State Department of Human Resources in accordance with the State's Civil Service System (Act).

The Division currently has 652 authorized positions.

THE CLASSIFICATION TITLE, GRADE, AND NUMBER OF POSITIONS IN EACH CLASSIFICATION ARE AS FOLLOWS:

TITLE AND NUMBER OF POSITIONS ---- 345.70

<u>TITLE</u>	<u>ABBREVIATION</u>	<u>GRAD</u> <u>E</u>	<u>NO.</u>
Accounting Technician 1	ACCTNG TEC 1	017	2
Administrative Assistant 1	ADMIN ASST 1	017	2
Administrative Secretary	ADMIN SEC	016	7
Administrative Services Assistant 2	ADMIN S AS 2	019	2
Administrative Services Assistant 5	ADMIN S AS 5	027	1
Blind Services Rehabilitation Center Manager	BLIND RC MGR	025	1
Building Maintenance Worker 2	BLDG M WKR 2	016	5
Building Maintenance Worker 3	BLDG M WKR 3	018	1
Business Enterprises Consultant 2	BUS ENT CN 2	021	5
Business Enterprises Specialist	BUS ENT SPEC	023	7
Business Enterprises Supervisor	BUS ENT SPV	028	3
Clerk 2	CLERK 2	010	1
Custodial Worker 2	CUST WKR 2	011	6
Custodial Worker Supervisor 1	CUST WKR S 1	014	1
Facilities Manager 1	FAC MGR 1	022	1
Field Supervisor 1	FIELD SUPV 1	025	33
Field Supervisor 2	FIELD SUPV 2	027	4
Hearing Impaired Director	HEAR I DIR	026	1
Human Services Program Coordinator	HS PRG CRD	026	17
Human Services Program Director 1	HS PGR DIR 1	030	3
Human Services Program Director 2	HS PGR DIR 2	032	4
Human Services Program Director 3	HS PGR DIR 3	033	1
Human Services Program Manager	HS PRG MGR	029	8
Human Services Program Specialist	HS PRG SPC	025	3
Human Services Program Supervisor	HS PRG SPV	029	9
Information Resource Support Specialist 5	IN RES SP 5	900	1
Licensed Practical Nurse 2	LPN 2	016	9
Licensed Practical Nurse 3	LPN 3	018	1
Nurse Assistant 2	NURSE ASST 2	10	2
Occupational Therapist Assistant (Certified)	OCC T AST C	900	2
Office Supervisor 1	OFF SUPV 1	016	10
Orientation And Mobility Specialist	ORNTN MOB SP	025	1
Physical Therapy Technician	PHYS T TECH	015	1
Physical Therapist	PHYS THERS	900	1
Procurement Officer 1	PROC OFF 1	18	1
Psychologist	PSYO	900	2
Psychological Examiner 1	PSYO EX 1	027	2
Recreation Therapist 2	REC THERS 2	021	6
Recreation Therapist 3	REC THERS 3	022	1
Registered Nurse 2	RN 2	900	1
Registered Nurse 3	RN 3	900	1
Registered Nurse 4	RN 4	900	1

TENNESSEE**DRAFT**

Rehabilitation Assistant	REHAB ASST	014	49
Rehabilitation Behavioral Instructor 2	REHAB B IN 2	021	9
Rehabilitation Instructor	REHAB INST	024	1
Rehabilitation Instructor – Blind	REHAB INST B	021	19
Rehabilitation Assistant Superintendent	REHAB ASUPT	029	1
Rehabilitation Superintendent	REHAB SUPT	032	1
Rehabilitation Training Center Manager	REHAB TC M	025	17
Secretary	SECRETARY	014	103
Security Chief	SECUR CHIEF	020	1
Security Guard 1	SECUR GRD 1	014	3
Vocational Instructor Per Specialty	VOC INS SPEC	900	9
Vocational Rehabilitation Counselor 2	VOC RHB CO 2	021	266
	TOTAL		650

TITLE AND NUMBER OF POSITIONS ---- 345.01

TITLE	ABBREVIATION	GRADE	NO.
ASSISTANT COMMISSIONER 2	ACOMM 2	040	1
ADMINISTRATIVE SERVICES ASSISTANT 2	ADMIN S AS 2	019	<u>1</u>
	TOTAL		2

The Division received 7,871 new applications for services in Fiscal Year 2007 and provided services to 38,583 individuals.

The Division's staffing level was adequate to meet the demand for services this past year (Fiscal Year 2008). The Division's staffing level remains adequate to meet the demand for services in Fiscal Year 2009. The Division currently experiences a staff attrition rate of approximately eighteen percent (18%).

The Division continues to receive and maintain monthly position classification/staffing reports prepared by the State Department of Human Resources. The reports detail each position by classification code, filled/vacant, salary, and other pertinent information. The reports are used to project the need for future staff positions along with an analysis of years of service, projected retirement dates, etc. The Division also receives/maintains reports/data in order to determine minority staff representation and Affirmative Action planning.

In Tennessee, there are two universities that have Council on Rehabilitation Education (CORE) certified programs providing a master's degree in rehabilitation counseling. One is in the eastern part of the state at the University of Tennessee at Knoxville; and the other is at the University of Memphis located in the western part of the state.

The University of Memphis currently has 12 graduate students in their on-campus program of which 5 students (42%) have disabilities. Of these 12 students, 4 (33%) are from minority groups. A total of 5 students completed the Master's in rehabilitation counseling program during this fiscal year with 2 of these students having a disability and 2 representing minority groups.

The University of Tennessee – Knoxville (UTK) has an on-campus program with 11 students currently enrolled full time. There is currently an 18% minority enrollment and a 27% enrollment of persons with disabilities, and two students are currently doing their practicum with the Division. The number who graduated from their program this past year was 1.

The Division's in-state training staff continues to meet quarterly with the program administrators at the University of Tennessee and the University of Memphis for the purpose of planning and sharing information relative to personnel development activities. These meetings provide the mechanism for gathering information on an annual basis relative to the number of students enrolled in their respective rehabilitation counselor education programs, as well as the number who graduated from their programs during the past year.

To further increase the number of counseling staff participating in Master's in rehabilitation counseling programs, the Division worked closely with the University of Tennessee-Knoxville in developing a new distance learning program. With the creation of this new online Master's in Rehabilitation Counseling program, the Division is fully funding 9 of its counseling staff at an estimated cost of \$18,500 per person.

To advance recruitment activities, the Division has dedicated a program specialist position in the staff development unit. This program specialist is actively seeking out other master's level programs, primarily those with RSA funded slots, to increase the number of incumbent staff in master's programs across the nation. Other duties of the program specialist include developing recruiting brochures to distribute at job fairs, speaking to graduate level programs to promote state employment in the rehabilitation field and encouraging incumbent staff to take advantage of graduate level training opportunities in rehabilitation counseling distance learning programs. The Division recognizes that recruitment activities are also the responsibility of counseling, supervisory and management level staff across the state with these personnel involved in recruitment activities in their regional and local communities. To enhance recruitment activities, the Division is actively working with its Human Resources Department to develop a paid internship program with projected implementation in fall 2008.

The Division continues its recruitment policy for staff from minority backgrounds and for staff who are individuals with disabilities. Along with the dedicated program specialist, supervisors and counselors continue their recruitment efforts from historically black colleges and universities and institutions of higher education noted for a high student population of individuals with disabilities. Supervisors and counselors continue to visit high schools and participate in job fairs in an effort to acquaint students with the rehabilitation counselor education programs, especially the programs at the University of Tennessee and the University of Memphis.

Counselors continue to counsel and encourage clients who are interested in pursuing post secondary training, especially clients from minority backgrounds, to consider vocational rehabilitation counseling as a profession. The Division's program manager for staff development and the program specialist continue to

work closely with university rehabilitation counselor education program administrators to stress the need for their recruitment of applicants from minority backgrounds and individuals with disabilities into their training programs.

Currently incentives for incumbent staff to participate in a master's degree program include financial assistance with tuition, books, fees, and minimal educational leave. Funding for a pay incentive based upon successful completion of a master's degree program was approved in January 2005 for graduates and has been requested and approved for each successive graduate.

The Division expects to retain qualified rehabilitation professionals who are on the staff by providing support services which will make their jobs easier. Counselors have computer capability and receive training in a variety of programs, including Internet utilization, to access rehabilitation materials. Numerous films, books and other printed materials are available to all offices within the Division. Counselors are encouraged to request copies of any materials of a professional nature which would assist them in their jobs.

The Division is continuing to explore additional ways to enhance retention of qualified staff. Letters of appreciation are sent by the Assistant Commissioner to employees who have exhibited exemplary performance or excelled in certain areas (e.g., receiving CRC credential). An annual awards luncheon is held to recognize master's degree recipients and staff receiving special service awards. In addition to flexible work hours, the vocational rehabilitation program leadership is also exploring other avenues to promote retention, such as a compressed work week and other activities to increase job satisfaction and staff morale.

The Division has historically based its personnel standards for counselors on the degree required for the national Certified Rehabilitation Counselor requirement, which is a master's degree in rehabilitation counseling or a closely related field, as defined by the Commission on Rehabilitation Counselor Certification (CRCC). During the past fiscal year, a total of 19 incumbent counselors have graduated from master's in rehabilitation counseling programs (10 from Auburn University, 7 from University of Kentucky, and 2 from University of Memphis).

In addition, the Division currently has 28 counseling staff enrolled in graduate level programs in rehabilitation counseling (3 at Auburn University, 8 at University of Kentucky, 9 at University of Tennessee - Knoxville, 5 at University of Wisconsin-Stout, 2 at University of North Texas and 1 at the University of Memphis).

Despite the Division's extensive efforts to hire and retrain staff, currently only 42% of counseling staff have a master's degree in rehabilitation counseling or related area. With only 42% of the Division's counseling staff meeting the existing state standard, 58% of Division staff would not be permitted to perform the non-delegable functions outlined by the federal guidelines for the upcoming fiscal year. This would create significant delays in case service to clients and would force the Division's counselors to carry disproportionate workloads.

A major change in this year's state plan is the Division's intent to use its state standard for the determination for a qualified vocational rehabilitation counselor.

This will assure that one hundred percent of the Division's vocational rehabilitation counselors performing the non-delegable functions identified in federal regulations will be qualified vocational rehabilitation counselors. The use of our state standard, rather than the degree necessary for the national standard, has been discussed with and endorsed by the State Rehabilitation Commission.

Although hiring and salary preference has been given to individuals with master's degrees in rehabilitation counseling, the state standard, in practice, has been established by the Tennessee Department of Human Resources (TDHR) through its certification and registry process. This standard for a qualified rehabilitation counselor requires a bachelor's degree and one year of experience as a vocational rehabilitation counselor. This is the highest standard in the State of Tennessee for certification of a vocational rehabilitation counselor.

TNDRS has continued to use the TDHR standard primarily because of the inability to hire enough people who meet the academic requirements outlined in the CSPD attachment of previous state plans. There are many reasons beyond the control of the Division as to why the majority of incumbent counselors and counselor applicants did not meet the national CSPD standard, including:

- There are an inadequate number of in-state master's degree training programs to feed candidates into our system. There are currently only two such university training programs in Tennessee (and these are located in the far eastern and western regions of the state).
- Many counselor positions are in rural areas where it is more difficult to recruit master's degree candidates.
- State law prohibits requiring incumbent counselors or new hires to get a master's degree as a condition of continued employment since the state certification and registry process does not require a master's degree.

Additional obstacles the Division has been unable to overcome include:

- a limited number of RSA sponsored training grants, and the number is shrinking;
- limited training slots in existing university programs, even where we fund such training through our section 110 dollars; and
- staff turnover.

Funding to support master's in rehabilitation counseling activities continues to be pursued through reallocation of traditional in-service training monies and utilization of funding received through our Social Security Administration (SSA) reimbursement program. Also, the Division continues to work closely with any college or university to help secure any grant funding made available to help the Division further counselor education.

Vocational rehabilitation counselors are being encouraged to take advantage of any training that will enable them to meet the CRC requirements. The State Department of Human Resources has guidelines in place for compensating employees who obtain a nationally recognized professional certification during their employment with the State.

The two main objectives outlined in their policy statement are:

1. To recognize employees who choose to enhance their competencies and service to the state through acquisition of knowledge and skills relevant to the performance of their major professional duties and responsibilities.
2. To provide an incentive to employees who successfully demonstrate acquisition of such competencies by attaining certification from a nationally recognized professional organization.

The intent is to provide both a means of encouraging employees to attain professional competencies and to provide an incentive for these employees to remain in State service. Funding for this incentive program continues to be very limited. However, the Division is aggressively seeking adequate funding for this incentive. In an effort to assist CRC staff with maintaining this credential, the Division has received approval from the CRCC to provide continuing education credits for qualified training events.

In regard to staff evaluation, the Department of Human Resources has a very comprehensive job performance planning and evaluation system utilized by all State agencies. The purpose of the job performance and evaluation system is to promote employee development, enhance employee productivity, serve as a basis for sound personnel decisions, and provide a record of the performance of major job duties and responsibilities of employees.

The two major goals of the job performance planning and evaluation system are:

1. To maximize the performance and job satisfaction of individual employees by encouraging and reinforcing communication between supervisors and employees.
2. To provide a more objective basis for personnel decisions.

Each employee continues to have a formal written evaluation conducted in accordance with the above evaluation process annually. Supervisors/managers with the responsibility for conducting and/or reviewing the performance evaluation of employees are given formalized training in the job performance planning and evaluation system.

A critical step in the evaluation process is the initial discussion (job plan) where major job duties and responsibilities are identified. The Division has developed formalized job catalogs to assist supervisors in the defining of major job duties and responsibilities of employee classifications utilized by the Division (i.e. vocational rehabilitation counselor, secretary, etc).

The process of ensuring that the job duties and responsibilities that are defined on the job plan are consistent with tasks that facilitate the serving of individuals with disabilities, including those with the most significant disabilities, ensures that the system furthers the purpose of Title I.

Having a formalized evaluation system that ensures ongoing communications between supervisors and employees also serves as a mechanism for ensuring that the system furthers the purpose of Title I.

Recognizing that a state's standard for qualified rehabilitation counselors, regardless of academic requirements, is only a starting point for development of a dedicated, knowledgeable and creative staff, the Division is placing a heavy emphasis on training all of staff members in the areas believed to be critical for success as vocational rehabilitation counselors. Therefore, all counseling staff must complete a series of courses to include the following:

1. Caseload Management
2. Vocational Guidance and Counseling
3. Medical Aspects (3 Sessions)
4. Psychiatric Disorders
5. Developmental Disabilities
6. Effective Communication for Rehabilitation Professionals
7. Interviewing Skills for Rehabilitation Professionals
8. Decision Making Skills for Rehabilitation Professionals
9. Job Placement

Although these courses are not required as a condition of employment with the Division, all staff will be required to successfully complete all of the courses as part of their job duties. It is believed that the Division's CSPD standard and its own in-house training assures that only qualified rehabilitation personnel will be serving clients with disabilities.

The aforementioned training sessions have traditionally been provided through the University of Tennessee's Southeast Rehabilitation Continuing Education Program (SRCEP). However, with the proposed federal dissolution of the RCEPs, the Division will need to seek alternative means of providing these integral training sessions to its staff. The Division is currently exploring alternate means of providing these training events.

The Division continues its efforts for succession planning with activities currently directed towards development of a comprehensive succession planning program. The Division's administrative and management staff continues to explore projected strengths and weaknesses five years from this date, with direct consideration of the personnel and leadership of the Division. It is the plan of the Division to insure a cadre of supervisory and managerial staff for future years. This is being accomplished on a year-to-year basis through extensive in-service and out-service training programs offered to our new supervisory staff. Several of the counselors who have completed their master's degrees have moved into supervisory roles within the Division.

New supervisors continue to participate in the Georgia State University New Supervisory Training Program. Staff throughout the Division participated in Department of Human Resources training events, of which many are designed for supervisory and administrative staff with an objective of allowing personnel to move into leadership positions. The State Department of Human Resources has developed and implemented a Leadership Development Initiative consisting of a

number of core management skills training courses. All supervisors and managers are required to participate.

The Division continues its collaboration with the Georgia State University Leadership Development Program to implement a values driven management system to promote client-centered service delivery. Management, regional and front line supervisors have participated in extensive training sessions to develop strategies for statewide implementation of the values driven client service delivery system.

Policy of the Department of Human Services and the Division of Rehabilitation Services requires an annual training needs assessment to determine training needs of staff. Our training needs assessment is completed through the following methods:

1. Statewide Training Needs Assessment Survey
2. Individual Staff Training Plans
3. State Rehabilitation Management and Administrative Staff Input
4. Regional Rehabilitation Continuing Education Program Studies and Suggestions
5. State Human Resources Department Training Division Mandates
6. Rehabilitation Services Administration Guidelines
7. Recommendations of the State Rehabilitation Council and the Statewide Independent Living Council.
8. Counselor Competency Exam

Program case reviews conducted by the Division's Program Evaluation and Quality Assurance Unit are also utilized to identify strengths and deficiencies among staff and related training needs.

Results of the 2008 training needs assessment completed by all employees are as follows:

1. Computer Skills
2. Psychiatric Disorders
3. Spanish in the Workplace
4. Medical Aspects
5. Behavior Management
6. Assistive Technology
7. Independent Living Skills
8. Leadership Skills
9. Cultural Diversity
10. Job Placement

The Division continues to provide on-going training and technical assistance regarding the Americans with Disabilities Act to staff and the general public, including business and industry.

The Division continues to contract with technology centers across the state for training and technical assistance in rehabilitation technology services. Rehabilitation technology contracts are in place with the East Tennessee

Technology Access Center (Knoxville), Technology Access Center of Middle Tennessee (Nashville), West Tennessee STAR Center (Jackson), Signal Center (Chattanooga), and Mid-South Access Center for Technology (Memphis).

The Division's employees continue to receive specialized training in assessment and vocational evaluation activities. Through a partnership with the University of Memphis, vocational evaluators receive extensive instruction in the appropriate selection of assessment tools, interviewing skills, evaluation techniques and report writing.

Evaluators complete a competency examination with subsequent training provided based on the individualized needs of each employee. New counselors receive training relative to assessments, vocational evaluation and interpreting medical and psychological reports to assist them in acquiring skills to identify the specific strengths and weaknesses of individuals with disabilities. Training in the areas of vocational counseling, job placement and other topics relevant to client service delivery continue to be focal areas for the Division. A statewide training committee is currently developing new training modules to address the Division's needs. This new training program will provide supervisory staff with presentations, handouts and related training aids to assist them in providing direct training to new and incumbent counseling staff. This expanded training program will also include additional classroom activities to provide hands-on experience in critical areas such as interviewing, vocational counseling, interpreting reports for eligibility determinations and developing individualized plans for employment.

The Division has developed a comprehensive training database for tracking training activities which includes names of staff completing each activity and pre-test and post-test scores. This database also includes employees' educational levels and credentials. The Division will be adopting a new statewide enterprise resource planning system (Edison), which will provide additional means of tracking staff development activities. This fully integrated software application program is also expected to expand online training capabilities of the Division.

The Division has posted informational memoranda on its intranet website to provide staff with an easily accessible means of acquiring information on current research, resources and related activities in the vocational rehabilitation field. Leadership staff also disseminates new information (such as the latest IRI publications) through electronic conveyance. Employees, particularly those with specialized job responsibilities, are encouraged to attend conferences, seminars and training workshops relative to their specialty areas. Local, regional and statewide meetings provide an additional avenue for keeping employees informed of new developments in the vocational rehabilitation field.

The Division has policies and procedures to ensure that it includes among its personnel, or has readily available, the services of (1) Individuals able to communicate in the native languages of applicants and eligible individuals who have limited English proficiency through the Open Communications International services; and (2) Individuals able to communicate with applicants or eligible individuals in appropriate modes of communication. During staff orientation, new counselor training, annual Title VI training and other training activities, Division

staff members are informed of specific procedures to be followed to communicate with limited English speaking individuals. Telephonic translation services are available through Open Communications International. All regions have received orientation packages to be used to train all of their staff in the use of this service.

Additionally, through a quality award from the RSA In-Service Training Grant, funds are being utilized for training staff in Spanish language skills and cultural awareness. A 12-week Spanish in the Workplace training program has been developed and is being provided to targeted staff with ongoing public contact. Contractual negotiations are underway to provide additional cultural diversity training to all Division staff through a series of regional training sessions.

The Division continues to recognize its responsibility for employing or obtaining the services of sign language interpreters, which fall within the definition of "appropriate modes of communication" in (Sec. 361.5(b) (5)), to the extent necessary to meet the communication needs of individuals who are deaf or deaf-blind. The Division's policy addresses the (1) significance of such services, (2) the selection of service providers, (3) the scheduling and payment for services, and (4) an evaluation process for such services.

The Individuals with Disabilities Education Improvement Act (IDEA 2004) provides renewed emphasis toward the planning of service delivery and collaboration of the various divisions and programs designated to serve children and youth with disabilities.

The Division has an interagency agreement with the Division of Special Education, State Department of Education providing administrative support for a coordinated, collaborative effort of service delivery. The Blind and Visually Impaired Services unit continues an agreement with the Tennessee School for the Blind. Networking of the two divisions relative to transitioning services has provided a means for coordinating and sharing information relative to personnel development under the Individuals with Disabilities Education Improvement Act. There is ongoing communication between the two divisions and each division has responsibility for providing input into personnel development activities.

An interagency agreement was developed to fulfill the requirements of the Individuals with Disabilities Education Improvement Act (IDEA). The purpose of this agreement is to identify and define the financial responsibility of each state agency for providing services under IDEA and to facilitate the provision and coordination of services for all children with disabilities. The following state agencies are participating in this agreement: Department of Education (Division of Special Education; LEAs; TEIS; Department of Children's Services; Department of Finance and Administration (TennCare; Division of Mental Retardation Services); Department of Health; Department of Human Services/Division of Rehabilitation Services; Department of Mental Health and Developmental Disabilities.

The Division continues to recognize the value of the involvement of the Division's State Rehabilitation Council in its personnel development activities. It is the policy of the Division to give the Council ongoing review and input on the

development of issues associated with the Division's Comprehensive System of Personnel Development. The Council continues to be involved with CSPD issues associated with recruitment and retention of staff, counselor salaries and pay incentives for successful attainment of a master's degree in rehabilitation, and training for existing staff to obtain their master's degree.

Attachments to Title I State Plan

Attachment 4.11(b) - Annual Estimates

1. Tennessee's population based on Census 2000 data is 5,689,283. Tennessee's population 18 years and over is 4,290,762.

Research data indicates that:

- A. Approximately 20% of Americans have a disability.
- B. Approximately 12% have a significant disability.
- C. Approximately 18.7% of the population age 15 to 64 has a disability.
- D. Approximately 10.5% of the population age 18 to 64 has a work limitation.
- E. Approximately 10.2% of the working age population age 16 to 64 has a disability that prevents or limits work.

Research data further indicates that the highest percentages of individuals with work disabilities who are not working are in the South, with Tennessee being one of the highest. It is estimated that Tennessee's population between the ages of 16 and 64 is approximately 3.7 million and that 582,000 (15.7%) have a significant disability and may be eligible for services.

2. In Fiscal Year 2007, the Division of Rehabilitation Services provided services to 38,583 individuals. Of this number 36,142 met the eligibility criteria of the program. A total of 9,415 were individuals who met the eligibility criteria, but were not in an open priority category as of September 30, 2007. It is projected that 31,000 individuals will receive services and that 23,480 individuals will meet the eligibility criteria of the program and receive services in accordance with the Order of Selection during Fiscal Year 2009.

It is estimated that the number of individuals to be served during Fiscal Year 2009 under each priority category within our Order of Selection will be:

Priority Category	#1	<u>20,000</u> *	* This number includes an estimate <u>3,500</u> individuals eligible for Title VI, Part B Supported Employment
Priority Category	#2	<u>3,000</u>	
Priority Category	#3	<u>400</u>	
Priority Category	#4	<u>80</u>	
		23,480	TOTAL

1. It is estimated that the cost of services for the projected 31,000 individuals will be approximately \$28,909,000 and that the service cost for each priority category within the Order of Selection for the 23,480 individuals served will be:

Priority Category	#1	<u>\$25,000,000*</u>	* This number includes <u>2.8 million</u> Title I, Part B funds plus our Title VI, Part B funds to serve individuals eligible for Supported Employment
Priority Category	#2	<u>\$ 2,925,000</u>	
Priority Category	#3	<u>\$ 200,000</u>	
Priority Category	#4	<u>\$ 32,000</u>	
		\$ 28,157,000	TOTAL

Attachments to Title I State Plan**Attachment 4.11(c)(1) - State's Goals and Priorities**

The goals and priorities of the Division of Rehabilitation Services for Fiscal Year 2009, as developed and agreed to by the Division of Rehabilitation Services staff and the State Rehabilitation Council, are:

1. Streamline focus of the Division of Rehabilitation Services for client-centered, effective, successful service.

- a. Provide services to approximately 31,000 individuals. Services include information and referral for individuals on the waiting list in a closed priority category. As of 3/31/2008, there were 7,685 eligible individuals on the waiting list in closed priority categories.
- b. Achieve successful outcomes for at least 2,907 individuals with disabilities. Successful outcome means suitable employment that continues for a minimum of 90 days. (While the Division will continue to strive for the highest number of successful outcomes possible, it has set this minimum goal in accordance with 34 CFR 361.84(c)(1)(i) Performance Indicator 1.1.)
- c. At least 96% of individuals served and closed with successful employment outcomes will be individuals with significant disabilities.
- d. The success rate for individuals determined eligible and receiving services will be at least 65%. Success rate is determined by the number of Status 26 (Rehabilitated Cases) divided by the number of Status 26 plus the number of Status 28 (Non-Rehabilitated Cases).
- e. Achieve a 96% or higher satisfaction rating for the vocational rehabilitation program as reported by the consumer satisfaction survey program for successful outcome closures.
- f. Continue to promote and provide training to optimize the use of the client intake process to facilitate more counseling to include considerations such as healthcare, impact on SSA benefits, and economic needs through measures such as an improved application document. Counseling provided and referrals to other resources will be noted within the case file notes.
- g. Continue to increase employment opportunities for clients through the following services, measured by an increased number of clients entering employment after receiving those services:
 - i. Supported employment
 - ii. Job coaches

- iii. Appropriate self employment

2. Develop staff motivation and skills to deliver client-centered counseling.

- a. Continue our emphasis on client-centered values and services.
- b. Continue to support and encourage counselors seeking master's degrees in rehabilitation counseling.
- c. Implement new core course training for all counseling staff not holding a master's degree.
- d. Increase training for counselors, evaluators and related vocational rehabilitation staff on how effective rehabilitation technology options lead to successful employment outcomes.

3. Reach out to stakeholders to build resources, reputation and results.

- a. Develop a marketing/outreach plan that:
 - i. targets and reaches unserved or underserved populations, such as Spanish speaking clients and clients with TBI, autism, deaf-blindness, and mental illness;
 - ii. targets individuals with disabilities who meet our Order of Selection open Priority Category 1 classification;
 - iii. targets SSA beneficiaries seeking employment; and
 - iv. clearly conveys the employment purpose of our services.
- b. Continue to encourage partnerships with transportation providers to expand options for clients to participate in vocational rehabilitation and to secure sustainable transportation for employment.
- c. Continue to improve communication and partnership among DRS and other state agencies, community resource providers, career centers, employers and disability service providers.
- d. Continue to work collaboratively with and provide greater technical assistance to the workforce investment programs including career centers.
- e. Continue to encourage partnerships with local school systems for specialized vocational rehabilitation counselors to serve Transition from School to Work clients.

Attachments to Title I State Plan**Attachment 4.11(c)(3) - Order of Selection**

On August 1, 2001, the Division of Rehabilitation Services implemented an Order of Selection due to funding limitations that would not allow the Division to provide services to all eligible individuals who apply. The Division will continue to operate under an Order of Selection during Fiscal Year 2009. The Order of Selection has four priority categories and only Priority Category 1 (eligible individuals who have the most significant disabilities) remains open. However, we have begun to serve a limited number of individuals whose cases are in Priority Category 2 and who were on the waiting list. To date, we have had two releases with 668 cases coming off of the waiting list on October 1, 2007 and 1,339 cases on February 1, 2008. We will continue to assess our ability to release cases from the waiting list as resources allow. With limited funds and resources, the Division of Rehabilitation Services has not been able to provide services to all eligible individuals who have applied since August 2001. Therefore, execution of the Order of Selection mandated by the Rehabilitation Act of 1973, as amended, was and is still warranted. The Order of Selection serves as a means of determining which eligible individuals will be served.

The Division monitors services and expenditures on a continuous basis, allowing the Division to manage available funds to assure sustainability of services for cases placed in an open priority category and receiving services under an Individualized Plan for Employment (IPE). Additionally, adequate funds will continue to be conserved to provide assessment services for all applicants expected to apply throughout the year to determine eligibility and to provide services for those eligible individuals placed in an open priority category within the Order of Selection.

If the Division cannot continue to serve all new Priority Category 1 cases (eligible individuals who have the most significant disabilities) who apply, then services will be provided to new PC 1 cases based on the date of application for services. Likewise, should the Division have funding resources to open a closed priority category, but not be able to provide services to all cases currently awaiting services in that category; then services will be provided based on the date of application for vocational rehabilitation services. The Priority Category 2 releases have been based on date of application. The initial two releases have served all cases with application dates prior to December 31, 2003. The Division's Order of Selection is developed in keeping with 34 CFR 361.36 of the final regulations. The Order of Selection priority categories, justification, outcome and service goals, and time frames are as follows:

PRIORITY CATEGORY I -- Eligible individuals who have the most significant disabilities

Justification: Federal law and regulations require that individuals who have the most significant disabilities be selected for services before other eligible individuals with disabilities.

Outcome and Service Goal: Rehabilitate **2,210** individuals in this priority category.
Serve **20,000** individuals in this priority category.

Time frame to achieve goal: Goal will be achieved by **September 30, 2009**.

PRIORITY CATEGORY II -- Eligible individuals who have significant disabilities.

Justification: Individuals in this category make up a large portion of the unemployed population with disabilities due to serious limitations of functional capacities and require special consideration in an Order of Selection.

Outcome and Service Goal: Rehabilitate **580** individuals in this priority category.
Serve **3,000** individuals in this priority category.

Time frame to achieve goal: Goal will be achieved by **September 30, 2009**.

PRIORITY CATEGORY III --Eligible individuals who do not have significant disabilities and whose vocational rehabilitation is expected to require multiple vocational rehabilitation services.

Justification: Individuals in this category are the most disabled of the group without significant disabilities due to their expected need for multiple services.

Outcome and Service Goal: Rehabilitate **102** individuals in this priority category.
Serve **400** individuals in this priority category.

Time frame to achieve goal: Goal will be achieved by **September 30, 2009**.

PRIORITY CATEGORY IV -- Eligible individuals who do not have a significant disability that cannot be classified into a higher priority category.

Justification: This is a category to include all other eligible individuals. This category will assure all eligible individuals would receive services if sufficient funds are available to open this category.

Outcome and Service Goal: Rehabilitate **15** individuals in this priority category.
Serve **80** individuals in this priority category.

Time frame to achieve goal: Goal will be achieved by **September 30, 2009**.

DEFINITIONS

"Most Significant Disability" means the individual meets the criteria for having a significant disability but has a physical or mental impairment that seriously limits two or more functional capacities in terms of an employment outcome.

"Significant Disability" means the individual meets the three following criteria:

1. The individual has a severe physical or mental impairment which seriously limits at least **one** functional capacity (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome; **and**
2. The individual has one or more physical or mental disabilities resulting from amputation, arthritis, autism, blindness, burn injury, cancer, cerebral palsy, cystic fibrosis, deafness, head injury, heart disease, hemiplegia, hemophilia, respiratory or pulmonary dysfunction, mental retardation, mental illness, multiple sclerosis, muscular dystrophy, musculoskeletal disorders, neurological disorders (including stroke and epilepsy), paraplegia, quadriplegia and other spinal cord conditions, sickle cell anemia, specific learning disability, and end-stage renal disease; or another disability or combination of disabilities determined on the basis of an assessment for determining eligibility, and vocational rehabilitation needs to cause comparable substantial functional limitation; **and**
3. The individual's vocational rehabilitation program can be expected to require multiple vocational rehabilitation services over an extended period of time.

"Non-Significant Disability" means the individual does not meet the criteria for significant disability or the criteria for most significant disability.

"Multiple vocational rehabilitation Services" means two or more major vocational rehabilitation services, i.e. physical or mental restoration, training, counseling, guidance and placement. Excluded are support services such as transportation, maintenance, and the routine counseling and guidance that should take place in every case.

"Extended Period of Time" means 6 months or more from the date services are initiated.

Attachments to Title I State Plan**Attachment 4.11(c)(4) - Goals and Plans for Distribution of Title VI, Part B Funds**

The Division continues to provide supported employment services to eligible clients with the most significant disabilities who have been determined to require on-going support services in order to maintain employment.

Supported employment services are funded through Title VI, Part B funds. As Title VI, Part B funds are depleted, the continuance of supported employment services is made possible through Title I, Part B funds. The Division anticipates spending in excess of **2.8 million dollars** of Title I, Part B funds in addition to its Title VI, Part B funding allotment (projected to be approximately **\$506,720**) in Fiscal Year 2009.

It is the continued goal of the Division to provide quality supported employment services which are delivered in an effective, efficient and timely manner. Supported employment services are provided through letters of understanding with community rehabilitation providers, and in cooperation with the Division of Mental Retardation Services and the Department of Mental Health and Developmental Disabilities. The community rehabilitation providers must assure that on-going support services will be provided prior to the implementation of supported employment services.

The Division will continue to seek community rehabilitation providers to provide supported employment services to under-served disability groups with the most significant disabilities who, because of their disability, have not been able to enter traditional competitive employment or whose employment is intermittent or interrupted due to a most significant disability.

The Division expects to serve in excess of **3.500** clients through the supported employment program during the **Fiscal Year 2009** and achieve successful employment outcomes for **600** clients.

Attachments to Title I State Plan**Attachment 4.11(d) - State's Strategies and Use of Title I Funds for Innovation and Expansion Activities**

The State Plan shall include an assurance that the State will reserve and use a portion of the funds allotted to the State under Section 110 for the development and implementation of innovative approaches to expand and improve the provision of vocational rehabilitation services to individuals with disabilities, particularly individuals with the most significant disabilities, consistent with the findings of our statewide needs assessment and our goals and priorities.

Funds will be utilized in Fiscal Year 2009 for addressing the following priorities that continue to be identified in our needs assessment as they relate to individuals with the most significant disabilities, including those who need supported employment services; individuals with disabilities who are minorities; individuals with disabilities who have been unserved or underserved by the vocational rehabilitation program; and individuals with disabilities served through other components of the statewide workforce investment system and personnel assisting those individuals through the components of the system: Education and Training; Employment Opportunities; Information; Support Services; and Counseling and Guidance.

1. Continue the practice of ensuring the availability of appropriate training activities and resources to meet the individualized needs of clients by seeking out and developing partnerships with other private and public entities to provide specialized education and training activities, to include those that can be provided through self-employment and on-the-job-training by employers.
2. Continue to support expansion of supported employment services by actively seeking out community rehabilitation providers that are willing to provide supported employment services to vocational rehabilitation clients with the most significant disabilities; and by continuing partnerships with the Department of Finance and Administration, Division of Mental Retardation and the Department of Mental Health and Developmental Disabilities in the development of innovative programs/services leading to employment of individuals deemed eligible for supported employment services.
3. Continue to increase employment opportunities for clients through development of regional job coach pools; targeted marketing and education services to employers; and the provision of additional technical support and expertise to DRS staff and clients in the areas of technology, self employment, mental health and supported employment issues.
4. Continue the search for and collaboration with community rehabilitation providers within the state, especially in the more rural areas, to provide supported employment services to individuals with the most significant disabilities; continue efforts to improve services in collaboration with community rehabilitation providers who work with individuals with

- intellectual disabilities and mental illness and provide services directly geared toward the successful employment of individuals with the most significant disabilities.
5. Continue to support expansion of Transition School-to-Work services by continuing to work with Local Education Agencies (LEAs) in the maintenance of existing partnerships and the creation of additional partnerships to provide vocational rehabilitation services targeted specifically to that LEA's school system; continuing to work with and educate school personnel on the mission and scope of the Division of Rehabilitation Services in order to maximize services from both entities to better serve our mutual clientele.
 6. Continue expansion (where appropriate) of and improvement in the service delivery of the Agency's 17 community rehabilitation centers and the comprehensive rehabilitation center at Smyrna geared directly toward providing services leading to successful employment of individuals with the most significant disabilities.
 7. Continue support of vocational rehabilitation counselor development by encouraging and supporting vocational rehabilitation counselors to obtain master's degrees in rehabilitation counseling. The Division will pursue all available RSA slots for Master's level training available to the Tennessee Division of Rehabilitation Services through outreach and research. The Division also will sponsor with vocational rehabilitation dollars ten slots for counselors to obtain master's degrees at the University of Tennessee at Knoxville. The Division will continue utilization of recruiter staff for recruiting vocational rehabilitation counselors who have a master's degree in rehabilitation counseling. Finally, the Division will continue financial support of counselors seeking master's degrees and will implement the new core course training program for non-master's counselors.
 8. Continue to develop and implement a marketing/outreach plan that targets and reaches unserved or underserved populations, such as Spanish-speaking clients and clients with traumatic brain injury, autism, deaf-blindness, and mental illness; targets individuals with disabilities who meet our Order of Selection open Priority Category 1 classification; targets SSA beneficiaries seeking employment; and that clearly conveys the employment purpose of our services.
 9. Continue to provide training to vocational rehabilitation counselors on the client intake process to encourage gathering of all needed client information to facilitate more discussion, as well as appropriate and targeted guidance and counseling, on the front end and throughout the client's vocational program. This counseling and guidance will incorporate considerations such as special needs and accommodations, SSA benefits and incentives, targeted training and employment exploration; and will facilitate exploration of specific resources and services that are available and/or that may be needed during their vocational rehabilitation program and beyond.
 10. Continue to support the Workforce Investment System by co-locating vocational rehabilitation counselors in each of the major WIA Service delivery area career centers and ensuring that all career center satellites

also have vocational rehabilitation counselors assigned to visit their centers on a regular basis to work with individuals with disabilities that visit each center.

11. Continue to provide cross training to the career center staff in regard to meeting the needs of individuals with disabilities. Continue to provide consultation on career center accessibility and accommodation needs in regard to the accessibility needs in the building(s) and accommodations in terms of appropriate technology needed to serve individuals with the most significant disabilities.
12. Continue to support the Ticket to Work and Self-Sufficiency Program and use of other Social Security work incentives that benefit clients by continuing to have DRS staff dedicated to the Ticket to Work and Self-Sufficiency Programs. These staff members will provide expert advice to DRS staff, clients and families on the SSA work incentives in regard to educational and work incentives, including how clients can utilize SSA health benefits while in the vocational rehabilitation program and how employment will affect such benefits upon successful employment. The Division will also train staff on the new SSA regulations as well as how best to develop partnerships with employer networks.
13. Continue to increase partnerships with transportation providers to expand options for clients to participate in vocational rehabilitation and to secure sustainable transportation for employment; improve communication, partnership among DRS and other state agencies, community resource providers, career centers, employers and disability service providers; provide in-house expert consultation to staff, clients and their families as it relates to SSA benefits and how their employment will affect those benefits; continue and seek out new partnerships with other agencies that are able to provide those support services not within the funding scope of DRS.
14. Continue training for counselors, evaluators and related vocational rehabilitation staff on how effective rehabilitation technology options lead to successful employment outcomes.
15. Continue support of the State Rehabilitation Council. Council members will be reimbursed for reasonable and necessary expenses for attending Council meetings and performing Council duties (including child care and personal assistance services).
16. Continue support of the Statewide Independent Living Council. Council members will be reimbursed for reasonable and necessary expenses for attending Council meetings and performing Council duties (including child care and personal assistance services).
17. Continue to submit to the Commissioner an annual report of how funds are utilized relative to innovation and expansion activities.

18. Move forward with those federally funded capital projects which have been approved but not started at the comprehensive rehabilitation center in Smyrna. Those projects include:

- Dormitory Renovation Project Buildings D and E. Federal funds earmarked for this project are \$5,667,124.
- Security Upgrade Project. Federal funds earmarked for this project are \$512,000.
- Elevator Connector Wall Upgrade. Federal funds earmarked for this project are \$242,000.
- Exterior Lighting Project. Federal funds earmarked for this project are \$138,000.

Attachments to Title I State Plan**Attachment 4.11(e)(2) - Evaluation and Reports of Progress**

An evaluation of the effectiveness of Tennessee's vocational rehabilitation Program reflects the following accomplishments for Fiscal Year 2007:

1. The Division continues to work with the State Rehabilitation Council to advocate for additional state appropriations to enable the Division to serve all eligible Tennesseans. However, with continued limited funds and resources the Division of Rehabilitation Services has not been able to provide services to all eligible individuals who have applied since August 2001. Therefore, execution of the Order of Selection mandated by the Rehabilitation Act of 1973, as amended, was and is still warranted.
2. Regional marketing plans have been developed and have been implemented in each region in an effort to reach unserved and underserved individuals with disabilities who meet the Division's Order of Selection open Priority Category 1 classification. However, the Division continues to work to improve the marketing and outreach activities and is in the process of developing updated brochures for distribution in each region.
3. The Division served 38,583 individuals with disabilities in Fiscal Year 2007.
4. Two thousand eight hundred eight (2,808) achieved successful outcomes (Rehabilitated). Successful outcome means suitable employment that continues for a minimum of 90 days.
5. Of the 2,808 successful outcomes, 2,618 (92.57%) were individuals with significant disabilities.
6. In an effort to increase successful work outcomes for individuals receiving SSA benefits, the Division continues to work on identifying and addressing issues which may be employment disincentives impacting SSI/SSDI Ticket to Work holders. The Division is also addressing these issues at the national level by working with the Rehabilitation Services Administration.
7. The Success rate achieved by the Division was 62.96%. Tennessee's rate is Status 26 (Rehabilitated Cases) divided by the number of Status 26 plus the number of Status 28 (Non-Rehabilitated Cases).
8. The Division achieved a 96.5% satisfaction rating for successful outcome closures; an 87.3% satisfaction rating for unsuccessful outcome closures and a 94.5% satisfaction rating for active cases currently receiving services as reported by the Consumer Satisfaction Survey program for Fiscal Year 2007.
9. In an effort to recruit vocational rehabilitation counselors with a Master's

Degree in Rehabilitation Counseling to meet the CSPD criteria for a qualified rehabilitation counselor in Fiscal Year 2007, the Division hired a recruiter whose responsibility is to aggressively market the job of vocational rehabilitation counselor to new graduates of all of the universities that provide training in a master's degree in Rehabilitation Counseling and recruit those graduates to fill vocational rehabilitation counselor positions. In addition, the recruiter will continue efforts to recruit staff that already has a master's degree.

10. The Division has on staff an expert in the area of technology, and it is the job of this individual to research and stay abreast of the most current advancements in the area of rehabilitation technology and convey this information to the field staff. The Division continues to provide training on assistive technology in order that the vocational rehabilitation counselor has the knowledge to better advise clients of rehabilitation technology options at every stage of the vocational rehabilitation process.
11. In an effort to increase specialized technical assistance to field staff, the Division has state office staff whose job it is to be experts in the subject areas pertaining to client service delivery and are available to advise the field staff in these areas: Examples (not all inclusive) of these areas of expertise are: personal care assistance; self employment; ticket to work; employment; supported employment; transition from school to work; contracts; quality assurance; vehicle modification; etc.

The State Rehabilitation Council in its Annual Report on the Status of the vocational rehabilitation program operated within the State of Tennessee dated December 31, 2007, reflected on many of the above accomplishments in its report and commended the Division for an exceptional job providing quality and timely services to individuals with disabilities.

An assessment of Tennessee's performance relative to Standards and Indicators pursuant to Section 106 of the Act reflects that the Division of Rehabilitation Services consistently meets or exceeds national averages. This assessment has been substantiated by the last two RSA Annual Monitoring activities.

The Division reserved funds allotted to the State under Section 110 to support Innovation and Expansion (I & E) activities in Fiscal Year 2007 as follows:

Improved and expanded placement services to increase the number of individuals with disabilities who were placed into competitive employment by:

- Expanding placement services available to individuals eligible for vocational rehabilitation services through community rehabilitation programs.
- Increasing the availability and utilization of quality job readiness skills training to all customers with disabilities who demonstrated a need for these services.

- Increasing employer and staff awareness and knowledge of Americans with Disabilities Act requirements and Section 504 requirements. Staff of the Division of Rehabilitation Services continued to coordinate and conduct regional workshops for employers and staff.
- Increasing the number of clients placed into integrated competitive employments that were referred from the Division of Mental Retardation Services' Developmental Center program.

Attachment to Title VI, Part B Supplement to Title I State Plan**Attachment 6.3 - Quality, Scope and Extent of Supported Employment Services**

The Division continues to provide supported employment services to eligible clients with the most significant disabilities who have been determined to require on-going support services in order to maintain employment.

Supported employment services are funded through Title VI, Part B funds. As Title VI, Part B funds are depleted, the continuance of supported employment services is made possible through Title I, Part B funds. The Division anticipates spending in excess of 2.8 million dollars of Title I, Part B funds in addition to its Title VI, Part B funding allotment (projected to be approximately **\$506,720**) in Fiscal Year 2009.

It is the continued goal of the Division to provide quality supported employment services which are delivered in an effective, efficient and timely manner. Supported employment services are provided through letters of understanding with community rehabilitation providers (CRPs), and in cooperation with the Department of Finance and Administration, Division of Mental Retardation Services and the Department of Mental Health and Developmental Disabilities. The CRPs must assure that ongoing support services will be provided prior to the implementation of supported employment services.

The number of supported employment providers has increased over the past two years to average 100 supported employment CRPs. While the number of CRPs may appear adequate to serve the Division's supported employment clients, there remains a shortage of CRPs able to provide supported employment services to persons involved in the state's de-institutionalization efforts. The Division will continue to enter into supported employment agreements with appropriate state agencies, as well as private and/or non-profit agencies which have the capabilities of providing quality service delivery to include on-going support services. In this regard, the Division will assertively seek those agencies that will provide supported employment services to persons being transitioned from institutional settings to the community and to work in competitive, integrated employment settings.

The Division will continue to seek CRPs to provide supported employment services to under-served disability groups with the most significant disabilities who, because of their disability, have not been able to enter traditional competitive employment or whose employment is intermittent or interrupted due to a most significant disability.

The Division will continue to contract for services of the University of Tennessee Center for Disability and Employment (UT-CDE), Auburn University, and the Community Rehabilitation Provided-Rehabilitation Continuing Education Program (CRP-RCEP) through Georgia State University. These programs will provide continued technical assistance and training to the Division's staff and contracted community services to assure competency and compliance.

The UT-CDE program will conduct various studies of the components of the supported employment program and make recommendations for the improvements based upon these studies.

The Division expects to serve in excess of 3,500 clients through the supported employment program during the Fiscal Year 2009 and achieve successful employment outcomes for 600 clients.